

September 27, 2024

**VIA ECF**

Hon. Katherine Polk Failla  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 618  
Southern District of New York  
New York, NY 10007

**MEMO ENDORSED**

Re: **Hansen v. Gerson Lehrman Group, Inc., 24 Civ. 2194**  
**Whelan, Jr., et al. v. Gerson Lehrman Group, Inc., 24 Civ. 2202**  
**Knapp v. Gerson Lehrman Group, Inc., 24 Civ. 2229**  
**Miller, et al v. Gerson Lehrman Group, Inc., 24 Civ. 2725**

Dear Judge Failla:

As Your Honor is aware, our firm represents Plaintiffs in this consolidated class action. We respectfully submit this consent motion pursuant to Your Honor's Individual Rules of Practice 2(C)(i) to respectfully request a final, thirty-day extension of time to file the consolidated amended complaint in this matter and a corresponding extension of time for Defendant to answer, move, or otherwise respond to the consolidated amended complaint.

On May 24, 2024, the Court entered an order consolidating four related actions and setting the deadline to file a consolidated amended class action complaint as June 28, 2024. Doc. 14. The order further set Defendant's deadline to answer, move, or otherwise respond to the consolidated amended complaint as August 16, 2024, noting that if Defendant filed a pre-motion letter, the Court would hold a pre-motion conference and set a briefing schedule at that time.

On July 30, 2024, Your Honor entered an order extending the time for Plaintiffs to file the consolidated amended complaint up to and including August 28, 2024, and for Defendant to answer, move or otherwise respond to same up to and including October 16, 2024. Dkt. 21. A subsequent 30-day extension was requested and granted by Your Honor (*see* Docs. 18 and 22), making Plaintiffs current deadline to file the consolidated amended complaint September 27, 2024.

Plaintiffs now seek a final thirty-day extension of time to file the consolidated class action complaint, to October 28, 2024, to allow them to conduct additional factual and legal investigation into their claims and explore the potential for early resolution. Plaintiffs further request a

corresponding extension of time for the deadline for Defendant to answer, move, or otherwise respond to the consolidated amended complaint to be extended to December 16, 2024. This is the fourth and final request for an extension of these deadlines and Defendant is unopposed to this request.

Should Your Honor have any questions or require additional information, please feel free to contact Plaintiffs' counsel.

Sincerely,

/s/ Mason A. Barney

Mason A. Barney  
SIRI & GLIMSTAD LLP  
mbarney@sirillp.com  
Attorney for Plaintiffs

cc: All counsel of record via ECF

Application GRANTED. Plaintiffs shall file their consolidated amended complaint on or before **October 28, 2024**. Defendants shall answer, move, or otherwise respond to the consolidated amended complaint on or before **December 16, 2024**.

The initial pre-trial conference currently scheduled for November 26, 2024, is hereby ADJOURNED to **January 10, 2025**, at **3:30 p.m.** The dial-in information remains the same: At the designated time, the parties shall call (888) 363-4749, and use access code 5123533.

The Clerk of Court is directed to terminate the pending motion at docket entry 23.

Date: September 27, 2024  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE